

## REMARKS

Paragraphs 20, 26, 28, 30, 32, and 34 of the specification have been amended to correct minor typographical errors.

The Examiner rejected all of the claims pending in the application under U.S.C. 103(a) as being obvious in view of the combined teachings of the Sanchez et al. and Van Ert et al. references. These rejections are respectfully traversed.

The teaching of the Sanchez et al. reference is quite different from the teaching of the Van Ert et al. reference. The Sanchez et al. reference relates to a method of eliminating curl and fabric distortion in a laminate, or *after molding fibrous fabrics that are backcoated* (see Column 1, Lines 6 through 9). Unfortunately, the text of the Sanchez et al. reference is confusing and some terms are used inconsistently. When viewed after the definitions of terms used therein are understood however, it is clear that the Sanchez et al. reference does not teach or suggest the invention as recited in Applicants' claims.

The Sanchez et al. reference states that the invention relates to "*fibrous fabrics which are backcoated*," (see Column 1, Lines 6 through 9) and identifies carpet and "*fabric laminates*" (see Column 1, Line 9) as examples. The Sanchez et al. reference variously refers to such fabric laminates as "*fibrous fabrics which are backcoated*," (see Column 1, Lines 6 through 9) "*fabrics ...provided with a moldable backing*," (see Column 1, Lines 26 through 27) "*backcoated fabric*," (column 1, line 39) and "*the fabric*" (see Column 2, Line 5). Clearly, the Sanchez et al. reference intended such terms to be used synonymously, such that "*fabric laminate*" is synonymous with "*backcoated fabric*," and with "*fabric*."


Further, the Sanchez et al. reference at Column 2, Lines 31 through 41, specifically defines "fabric" as "comprising a face fabric and backing layer," i.e., a fabric laminate, as noted above. Thereafter, and throughout the written description of the invention, the term "fabric" is used in the context of a laminate; i.e., a combination of a face fabric and a backing layer. When viewed in such a context, it is clear that all references to "fabric" refer to a fabric laminate, and that the fabric portion of the laminate is referred to as a "face fabric."

As stated in the Sanchez et al. reference, the invention is directed to modifications in the molding hardware to minimize distortion. The molding process described in the Sanchez et al. reference begins with a fabric laminate, i.e., fabric having a moldable backing already coated to the face fabric. The specific examples disclosed beginning at Column 10, Line 54 also each begin with a *fabric* having a polyethylene backing already applied. The remaining description discloses heating the fabric laminate so that the fabric laminate can be formed in a compression mold. In contrast, the Van Ert et al. reference relates to method of forming a headliner comprising a layer of formable material and a layer of a cover member; i.e., forming a laminate.

Therefore, the teachings of the Van Ert et al. reference cannot be reasonably combined with the teachings of the Sanchez et al. reference as suggested by the Examiner. A person of ordinary skill in the art would not find the teachings of the Van Ert et al. reference to be relevant to the teachings of the Sanchez et al. reference.

The cited references do not describe the claimed invention, and a person of ordinary skill in the art would not find it obvious to modify the cited reference as suggested by the Examiner. Accordingly, the invention as defined in the claims is clearly patentable over the cited references, and the applicants respectfully request that the rejections be withdrawn.

Respectfully submitted,



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